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*Knowledge, Focus, Expertise*

**WANG, GAO &  
ASSOCIATES P.C.**

August 3, 2016

**VIA ECF**

Hon. Douglas E. Arpert, U.S.M.J.  
United States District Court  
District of New Jersey  
402 East State Street  
Trenton, NJ 08608

Re: Weigan Wang, et al. v. Chapei, LLC, et al  
Case No. 15-cv-02950

Dear Judge Arpert,

This firm represents the Defendants in the above referenced matter. I write to supplement our response to the Plaintiffs' letter motion to compel discovery.

Mr. Troy stated that he mailed discovery demands to me on April 26, 2016, which is a glaring misrepresentation. Attached hereto as **Exhibit A** are true copies of Certificates of Service annexed to the Plaintiffs' Interrogatories and Document Production Requests, signed by the Plaintiffs' counsel John Troy on April 26, 2016. Clearly, Mr. Troy certified himself that these discovery demands were only emailed to me, which directly contradicts his blatant lie to this honorable Court that they were properly served by mail.

The Court should deny the Plaintiffs' baseless motion, and impose appropriate sanctions on the Plaintiffs' counsel.

Respectfully submitted,

s/ Heng Wang  
Heng Wang, Esq.  
Counsel for the Defendants


# Exhibit A

**Certificate of Service**

I, John Troy, an attorney duly admitted in the State of New York and in this court by *pro hac vice*, hereby certify:

I have today served the annexed Interrogatories on the Defendants by causing a copy to be sent via electronic mail to their attorneys of record at their email address below.

Dated: April 26, 2016

By:   
John Troy  
TROY LAW, PLLC  
*Attorney for Plaintiffs*

**SERVICE LIST:**

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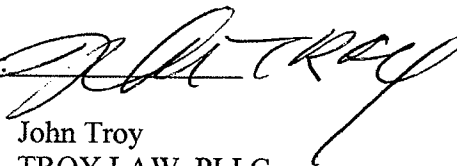
*Attorneys for Defendants*

**Certificate of Service**

I, John Troy, an attorney duly admitted in the State of New York and in this court by *pro hac vice*, hereby certify:

I have today served the annexed Plaintiffs' First Request for Production of Documents on the Defendants by causing a copy to be sent via electronic mail to their attorneys of record at their email address below.

Dated: April 26, 2016

By:   
John Troy  
TROY LAW, PLLC

*Attorney for Plaintiffs*

**SERVICE LIST:**

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